

foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.

**DOCUMENT REQUEST No. 47:**

47. Please provide all documents relating to any internal investigations conducted by You and/or the Charities into any alleged criminal, corrupt, or extremist activities of any individual or entity employed by and/or affiliated with the Charities, including without limitation any terrorist or radical religious, political, or social activities.

**OBJECTIONS AND RESPONSE TO REQUEST No. 47:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 48:**

48. Please provide all documents relating to any action taken by You and/or the Charities to prevent criminal activities, including the sponsorship of terrorists or radicals, by any individual or entity employed by and/or affiliated with the Charities or any of their branch offices.

**OBJECTIONS AND RESPONSE TO REQUEST No. 48:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 49:**

49. Please provide all documents relating to any action taken by You and/or the Charities to remove or purge radical or corrupt elements or individuals from the Charities' branch offices.

**OBJECTIONS AND RESPONSE TO REQUEST No. 49:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 50:**

50. Please provide all documents relating to any disciplinary action taken by You and/or the Charities, or any decision to terminate any relationship with any of the Charities' subsidiaries, affiliates, branch offices, officers, directors, trustees, board members, committee members, managers, agents, employees, volunteers, and/or representatives as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

**OBJECTIONS AND RESPONSE TO REQUEST No. 50:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 51:**

51. Please provide all documents relating to any disciplinary action taken by You and/or the Charities, or any decision to terminate any relationship with any of the Charities' supporters, donors, suppliers, contributors, facilitators, speakers, foreign government supporters, business supporters, or banks as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

**OBJECTIONS AND RESPONSE TO REQUEST No. 51:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 52:**

52. Please provide copies of all documents that have been seized by, or produced by

You and/or the Charities to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses the Charities' alleged support for, or connections to, alleged terrorist organizations, groups, individuals, or activities.

**OBJECTIONS AND RESPONSE TO REQUEST No. 52:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 53:**

53. Please provide all documents, statements, interviews, press releases, internal memos, or other materials relating to any accusation that the Charities, or any individual or entity employed by and/or associated with the Charities, was associated with or involved in any military or terrorist activity, plot or attack, indicating an intention to direct conduct against or target conduct toward the United States of America.

**OBJECTIONS AND RESPONSE TO REQUEST No. 53:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 54:**

54. Please provide all documents relating to any sanctions imposed upon the Charities by the United States, Kingdom of Saudi Arabia, United Nations, or any other nation or international body.

**OBJECTIONS AND RESPONSE TO REQUEST No. 54:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 55:**

55. Please produce all documents relating to any meetings, conferences, or gatherings You attended during Your tenure with the Charities relating to any accusation that the Charities, or any individual or entity employed by and/or associated with the Charities, was misusing or

misappropriating funds, engaging in criminal, corrupt, deviant, or extremist activities, sponsoring terrorist activities, and/or providing material support or resources to Osama bin Laden, al Qaeda and/or affiliated terrorist organizations. Responsive documents shall include, but are not limited to, any materials relating to meetings with representatives of the Kingdom of Saudi Arabia, the Saudi royal family, the Charities, and/or representatives from other foreign countries or international bodies.

**OBJECTIONS AND RESPONSE TO REQUEST No. 55:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 56:**

56. Please provide all documents relating to the MWL's secret office (Al Maktab Al Siri).

**OBJECTIONS AND RESPONSE TO REQUEST No. 56:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 57:**

57. Please provide all documents relating to the MWL's special or private office (Al Maktab Al Khass).

**OBJECTIONS AND RESPONSE TO REQUEST No. 57:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 58:**

58. Please provide all documents relating to any investigation or inquiry conducted by any United States Investigator, any Foreign Investigator, or any KSA Investigator, relating to You.

**OBJECTIONS AND RESPONSE TO REQUEST No. 58:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 59:**

59. Please provide copies of all documents that have been seized by, or produced by You to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, concerning any investigation or inquiry relating to You.

**OBJECTIONS AND RESPONSE TO REQUEST No. 59:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 60:**

60. Please provide all documents relating to any sanctions imposed upon You by the United States, Kingdom of Saudi Arabia, United Nations, or any other nation or international body.

**OBJECTIONS AND RESPONSE TO REQUEST No. 60:**

Defendant has no responsive documents since he has never been sanctioned by the United States, the Kingdom of Saudi Arabia, the United Nations, or any other nation or international body.

**DOCUMENT REQUEST No. 61:**

61. Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between the Charities and the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Da'wah and Guidance; the Ministry of Foreign Affairs, Endowments, Da'wah and Guidance; the Ministry of Defense and Aviation, Endowments, Da'wah and Guidance; the Majlis al Shura (a/k/a the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

**OBJECTIONS AND RESPONSE TO REQUEST No. 61:**

*See Objections to Document Request No. 10. Subject to and without waiving the*

foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.

**DOCUMENT REQUEST No. 62:**

62. Please provide all documents the Charities sent to, and/or received from, the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Da'wah and Guidance; the Ministry of Foreign Affairs, Endowments, Da'wah and Guidance; the Ministry of Defense and Aviation, Endowments, Da'wah and Guidance; the Majlis al Shura (a/k/a the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

**OBJECTIONS AND RESPONSE TO REQUEST No. 62:**

Defendant objects that this Request is overly broad; improperly seeks official records of the Saudi government; improperly seeks business records of the MWL or other entities; improperly seeks discovery beyond the limited scope of jurisdictional discovery authorized by the Court of Appeals and CMO No. 2 ¶ 17; improperly seeks information that post-dates the filing of the actions in this MDL-1570 proceeding; improperly seeks information that is not relevant to the exercise of personal jurisdiction; and improperly seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant or admissible information. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.

**DOCUMENT REQUEST No. 63:**

63. Please provide all documents governing, describing, detailing, or otherwise relating to the Charities' role in spreading, propagating, or proselytizing Islam outside of the Kingdom of Saudi Arabia, including without limitation any long term strategy, studies, or papers.

**OBJECTIONS AND RESPONSE TO REQUEST No. 63:**

*See Objections to Document Request No. 62.* Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.

**DOCUMENT REQUEST No. 64:**

64. Please provide all documents governing, describing, detailing, or otherwise relating to the Charities' role in advancing the foreign policy objectives of the KSA.

**OBJECTIONS AND RESPONSE TO REQUEST No. 64:**

*See Objections to Document Request No. 62. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 65:**

65. Please provide all documents relating to all accounts in any United States, Saudi Arabian, or foreign banking or financial institution the Charities currently hold, or have held, jointly with the KSA, any members of the Saudi royal family, or any Saudi official acting on behalf of the KSA ("KSA Joint Bank Accounts"), and/or any KSA Joint Bank Accounts over which You currently hold or have held signatory authority.

**OBJECTIONS AND RESPONSE TO REQUEST No. 65:**

*See Objections to Document Request No. 62. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 66:**

66. Please provide all documents relating to the role of the KSA and/or members of the Saudi royal family, in the creation, organization, funding, oversight, supervision, operation, and/or management of the Charities (including any subsidiary, affiliate, or branch office).

**OBJECTIONS AND RESPONSE TO REQUEST No. 66:**

*See Objections to Document Request No. 62. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 67:**

67. Please provide all documents relating to the Charities' initial capitalization and any subsequent funding provided by the KSA, members of the Saudi royal family, and/or any other individuals or entities.

**OBJECTIONS AND RESPONSE TO REQUEST No. 67:**

*See Objections to Document Request No. 62. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 68:**

68. Please provide all documents defining, establishing, or relating to the Charities' privileges, obligations, activities, and/or rights under the laws of the KSA.

**OBJECTIONS AND RESPONSE TO REQUEST No. 68:**

*See Objections to Document Request No. 62. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 69:**

69. Please provide all documents relating to any and all laws, statutes, regulations, ordinances, royal decrees, or directives issued by the KSA relating to the Charities, including but not limited to, documents relating to the organization, funding, oversight, supervision, management, and/or control over the Charities' operations, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, determination of which charitable designees should receive support, and/or actual distribution of financial and non-monetary support to charitable designees.

**OBJECTIONS AND RESPONSE TO REQUEST No. 69:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available;*

responsive documents may have been produced by the MWL, the IIRO, or the other named entities.

**DOCUMENT REQUEST No. 70:**

70. Please provide all documents relating to any fundraising events and/or conferences that were held for the benefit of the Charities and were promoted, sponsored, organized, funded, managed, attended, or supervised by the KSA, any member of the Saudi family, and/or any Saudi official acting on behalf of the KSA. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

**OBJECTIONS AND RESPONSE TO REQUEST No. 70:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 71:**

71. Please provide all documents relating to any meeting between officers or representatives of the Charities and any official or agency of the KSA, including without limitation, all meetings attended by representatives of the Kingdom of Saudi Arabia, members of the Saudi royal family, and/or representatives or special advisors from the King's chambers.

**OBJECTIONS AND RESPONSE TO REQUEST No. 71:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 72:**

72. Please provide all documents authored, published, or disseminated by You during Your tenure as an official representative of the Charities and/or Saudi Arabian government, relating to the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia,

Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Russia, Sudan, Somalia, Tanzania, Turkey, and Yemen. Responsive documents shall include, but are not limited to, copies of all interviews, statements, or speeches by You relating to same.

**OBJECTIONS AND RESPONSE TO REQUEST No. 72:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 73:**

73. Please provide all documents relating to fundraising activities conducted by You during Your tenure as an official representative of the Charities and/or Saudi Arabian government, in relation to relief or humanitarian efforts, or other operations, in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Russia, Sudan, Somalia, Tanzania, Turkey, and Yemen.

**OBJECTIONS AND RESPONSE TO REQUEST No. 73:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 74:**

74. Please provide all documents authored, published, or disseminated by You during Your tenure as an official representative of the Charities and/or Saudi Arabian government, discussing the legitimacy of any armed jihad or resistance by Muslims in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Russia, Sudan, Somalia, Tanzania, Turkey, and Yemen. Responsive documents shall include, but are not limited to, copies of all interviews, statements, or speeches by You relating to same.

**OBJECTIONS AND RESPONSE TO REQUEST No. 74:**

*See Objections to Document Request No. 10. Subject to and without waiving the*

foregoing objections, Defendant will produce responsive documents, if any, when available.

**DOCUMENT REQUEST No. 75:**

75. Please provide all documents authored, published, or disseminated by You during Your tenure as an official representative of the Charities and/or Saudi Arabian government, discussing the provision of support to mujahideen forces in any part of the World. For purposes of this request, the term “support” includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly. Responsive documents shall include, but are not limited to, copies of all interviews, statements, or speeches by You relating to same.

**OBJECTIONS AND RESPONSE TO REQUEST No. 75:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 76:**

76. Please provide all documents authored, published, or disseminated by You during Your tenure as an official representative of the Charities and/or Saudi Arabian government, discussing the provision of support to any armed jihad in any part of the World, regardless of whether such jihad was declared legitimate by competent religious authorities. For purposes of this request, the term “support” includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly. Responsive documents shall include, but are not limited to, copies of all interviews, statements, or speeches by You relating to same.

**OBJECTIONS AND RESPONSE TO REQUEST No. 76:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 77:**

77. Please provide all documents authored, published, or disseminated by You during Your tenure as an official representative of the Charities and/or Saudi Arabian government, which mention “jihad” ( (see Definition No. 25). Responsive documents shall include, but are not limited to, copies of all interviews, statements, or speeches by You relating to same.

**OBJECTIONS AND RESPONSE TO REQUEST No. 77:**

*See Objections to Document Request No. 10.* Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.

**DOCUMENT REQUEST No. 78:**

78. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and Osama Bin Laden (including any member of the Bin Laden family).

**OBJECTIONS AND RESPONSE TO REQUEST No. 78:**

*See Objections to Document Request No. 10.* Defendant further objects to this request on the grounds that other members of the Bin Laden family were dismissed for lack of personal jurisdiction. *In re Terrorist Attacks (Asat Trust Reg., et al.),* 714 F.3d 659 (2d Cir. 2013), *petition for reh'g denied* (June 10, 2013). Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.

**DOCUMENT REQUEST No. 79:**

79. Please provide all documents You and/or the Charities sent to and/or received from Osama Bin Laden or any member of the Bin Laden family, including without limitation, all documents relating to the transfer of funds between You and/or the Charities and Osama Bin Laden, and/or any member of the Bin Laden family.

**OBJECTIONS AND RESPONSE TO REQUEST No. 79:**

*See Objections to Document Request No. 10.* Defendant further objects to this request on the grounds that other members of the Bin Laden family were dismissed for lack of personal jurisdiction. *In re Terrorist Attacks (Asat Trust Reg., et al.),* 714 F.3d 659 (2d Cir. 2013), *petition for reh'g denied* (June 10, 2013). Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.

**DOCUMENT REQUEST No. 80:**

80. Please provide all documents relating to al Qaeda.

**OBJECTIONS AND RESPONSE TO REQUEST No. 80:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 81:**

81. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and al Qaeda, or any member of al Qaeda.

**OBJECTIONS AND RESPONSE TO REQUEST No. 81:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 82:**

82. Please provide all documents illustrating, describing, or otherwise relating to al Qaeda's formation and organizational structure, the duration of al Qaeda's existence, any documents relating to al Qaeda's initial capitalization and subsequent funding, any documents relating to the duties and powers of any al Qaeda boards and/or committees, and/or any other writing relating to the creation or purpose of al Qaeda.

**OBJECTIONS AND RESPONSE TO REQUEST No. 82:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 83:**

83. Please provide all documents relating to the establishment, duties, obligations, objectives, membership, composition and/or authority of any committees, boards and/or internal bodies of al Qaeda, including without limitation, al Qaeda's Majlis al Shura ("consultation council"), military committee, and fatwah committee.

**OBJECTIONS AND RESPONSE TO REQUEST No. 83:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 84:**

84. Please provide all documents identifying each member, officer, board member, and/or committee member of al Qaeda, including without limitation, any and all documents relating to their appointment, resignation, and/or termination.

**OBJECTIONS AND RESPONSE TO REQUEST No. 84:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 85:**

85. Please provide all documents relating to any meetings of members, officers, boards, committees, and/or internal bodies of al Qaeda, including without limitation, any agendas or meeting minutes.

**OBJECTIONS AND RESPONSE TO REQUEST No. 85:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 86:**

86. Please provide all documents relating to any meeting, conference, or gathering that You attended at which any of the persons identified in Attachment A were present, including but not limited to, the meeting between You, Osama bin Laden (a/k/a Abu Abdallah), Sheikh Abdel Majeed Zindani, and Dhiaul Haq as set forth in the MWL/TIRO document at Exhibit 1.

**OBJECTIONS AND RESPONSE TO REQUEST No. 86:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 87:**

87. Please provide all documents governing, describing, detailing, or otherwise relating to any relationship between You and/or the Charities and the persons and/or entities identified in Attachment A.

**OBJECTIONS AND RESPONSE TO REQUEST No. 87:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 88:**

88. Please provide all documents You and/or the Charities sent to, and/or received from, the persons and/or entities identified in Attachment A, including without limitation, all documents relating to the transfer of funds between You and/or the Charities and those persons and/or entities.

**OBJECTIONS AND RESPONSE TO REQUEST No. 88:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 89:**

89. From the period beginning January 1, 1988 through 1997, please provide all documents relating to any trips you took to Sudan.

**OBJECTIONS AND RESPONSE TO REQUEST No. 89:**

*See Objections to Document Request No. 10. Subject to and without waiving those objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 90:**

90. From the period beginning January 1, 1988 through 2002, please provide all documents relating to any trips you took to Afghanistan.

**OBJECTIONS AND RESPONSE TO REQUEST No. 90:**

*See Objections to Document Request No. 10. Subject to and without waiving those objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 91:**

91. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and Mohammed Jamal Khalifa (a/k/a Abu Bara), including without limitation all documents relating to your role in appointing Khalifa to positions within the MWL and IIRO. Responsive documents shall include, but are not limited to, Khalifa's personnel or employment files.

**OBJECTIONS AND RESPONSE TO REQUEST No. 91:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 92:**

92. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and Wa'el Hamza Jelaidan (a/k/a Abu Hasan al Madani), including without limitation all documents relating to Your role in appointing Jelaidan to positions within the MWL, IIRO, Rabita Trust, and Al Haramain Al Masjed Al Aqsa Charity Foundation. Responsive documents shall include, but are not limited to, Jelaidan's personnel or employment files.

**OBJECTIONS AND RESPONSE TO REQUEST No. 92:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 93:**

93. Please provide all documents You, the MWL, the IIRO, or Rabita Trust sent to, and/or received from, the Kingdom of Saudi Arabia and/or any third party, relating to any accusation that Khalifa or Jelaidan, including any individual or entity affiliated with those individuals, were associated with or involved in any criminal, corrupt, deviant, or extremist activity, including without limitation, any terrorist or radical religious, political, or social

activities.

**OBJECTIONS AND RESPONSE TO REQUEST No. 93:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 94:**

94. Please provide all documents relating to any internal investigation conducted by You, the MWL, the IIRO, or Rabita Trust, relating to any accusation that Khalifa or Jelaidan, including any individual or entity affiliated with those individuals, were associated with or involved in any criminal, corrupt, deviant, or extremist activity, including without limitation, any terrorist or radical religious, political, or social activities.

**OBJECTIONS AND RESPONSE TO REQUEST No. 94:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 95:**

95. Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with Khalifa or Jelaidan, including any individual or entity affiliated with those individuals, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

**OBJECTIONS AND RESPONSE TO REQUEST No. 95:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 96:**

96. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and any of the Golden Chain-Related Individuals, and/or any individual or entity associated therewith.

**OBJECTIONS AND RESPONSE TO REQUEST No. 96:**

*See Objections to Document Request No. 11.* Defendant further objects on the grounds that the “Golden Chain” is not a basis for personal jurisdiction. *See In re Terrorist Attacks*, 718 F. Supp. 2d 456, 482-83 (S.D.N.Y. 2010), *aff’d*, 714 F.3d 659 (2d Cir. 2013), *petition for reh’g denied* (June 10, 2013); *In re Terrorist Attacks*, 349 F. Supp. 2d 765, 817-18 (S.D.N.Y. 2005). Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.

**DOCUMENT REQUEST No. 97:**

97. Please provide all documents You and/or the Charities sent to, and/or received from, any of the Golden Chain-Related-Individuals, including without limitation, all documents relating to the transfer of funds between You and/or the Charities and the any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith.

**OBJECTIONS AND RESPONSE TO REQUEST No. 97:**

*See Objections to Document Request Nos. 11 and 96.* Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.

**DOCUMENT REQUEST No. 98:**

98. Please provide all documents relating to any accounts in any banking or financial institution You hold or held jointly with, or on behalf of any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith, including any accounts over which You hold or have held signatory authority.

**OBJECTIONS AND RESPONSE TO REQUEST No. 98:**

*See Objections to Document Request Nos. 11 and 96.* Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.

**DOCUMENT REQUEST No. 99:**

99. Please provide all documents relating to any accounts in any banking or financial

institution any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith, hold or held jointly with, or on behalf of the Charities, including any accounts over which the Golden Chain-Related-Individuals hold or have held signatory authority.

**OBJECTIONS AND RESPONSE TO REQUEST No. 99:**

*See Objections to Document Request Nos. 11 and 96. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 100:**

100. Please provide all documents relating to any investigations or inquiries conducted by any United States Investigator, Foreign Investigator, or KSA Investigator, into financial transactions linked to accounts held solely or jointly by any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith.

**OBJECTIONS AND RESPONSE TO REQUEST No. 100:**

*See Objections to Document Request Nos. 11 and 96. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 101:**

101. Please provide all documents relating to any decision to terminate any relationship with any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

**OBJECTIONS AND RESPONSE TO REQUEST No. 101:**

*See Objections to Document Request No. 11 and 96. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 102:**

102. Please provide all documents governing, describing, detailing, or otherwise relating to any relationship between You and/or the Charities and the persons and/or entities identified in Attachment B.

**OBJECTIONS AND RESPONSE TO REQUEST No. 102:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 103:**

103. Please provide all documents You and/or the Charities sent to, and/or received from, the persons and/or entities identified in Attachment B, including without limitation, all documents relating to the transfer of funds between You and/or the Charities and/those persons and/or entities.

**OBJECTIONS AND RESPONSE TO REQUEST No. 103:**

*See Objections to Document Request No. 10. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 104:**

104. Please provide all documents governing, describing, detailing, or otherwise relating to any relationship between You and/or the Charities and the persons identified in Attachment C (“Guantanamo Bay Detainees”). Responsive documents shall include, but are not limited to, their personnel or employment files.

**OBJECTIONS AND RESPONSE TO REQUEST No. 104:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 105:**

105. Please provide all documents relating to any meetings, interviews, or dialogue You and/or the Charities have had with any individual held at Guantanamo Bay, Cuba, including

without limitation, the persons identified in Attachment C (“Guantanamo Bay Detainees”).

**OBJECTIONS AND RESPONSE TO REQUEST No. 105:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available; responsive documents may have been produced by the MWL, the IIRO, or the other named entities.*

**DOCUMENT REQUEST No. 106:**

106. Please provide all documents relating to the building and property located at 20-24 Branford Place, Newark, New Jersey. Responsive documents shall include, but are not limited to, all materials relating to Your role in funding, purchasing, leasing, and/or operating that building and property.

**OBJECTIONS AND RESPONSE TO REQUEST No. 106:**

*See Objections to Document Request No. 11. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 107:**

107. provide all documents relating to any understanding or agreement with any defendant named in the consolidated civil action, 03 MDL 1570, whereby You have agreed to pay, indemnify, or reimburse any of their costs associated with defending this lawsuit, including legal fees and/or payments to satisfy part or all of a judgment that may be entered in this action against such defendant. Responsive documents shall include, but are not limited to, contracts, agreements, insurance policies, term sheets, or other records.

**OBJECTIONS AND RESPONSE TO REQUEST No. 107:**

*See Objections to Document Request No. 31. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

**DOCUMENT REQUEST No. 108:**

108. Please provide all documents relating to any understanding or agreement between You and any individual, entity, and/or government, whereby such party has agreed to pay, indemnify, or reimburse You for any of the costs associated with defending this lawsuit,

including legal fees and/or payments to satisfy part or all of a judgment that may be entered in this action against You. Responsive documents shall include, but are not limited to, contracts, agreements, insurance policies, term sheets, or other records.

**OBJECTIONS AND RESPONSE TO REQUEST No. 108:**

*See Objections to Document Request No. 31. Subject to and without waiving the foregoing objections, Defendant will produce responsive documents, if any, when available.*

Respectfully submitted,

*Alan R. Kabat*

---

Lynne Bernabei, Esquire (LB2489)  
Alan R. Kabat, Esquire (AK7194)  
Bernabei & Wachtel, PLLC  
1775 T Street, N.W.  
Washington, D.C. 20009-7102  
(202) 745-1942  
*Attorneys for Defendant Dr. Abdullah Naseef*

DATED: November 11, 2013

**CERTIFICATE OF SERVICE**

I hereby certify that on November 11, 2013, I caused the foregoing Objections and Responses to Plaintiffs' First Set of Jurisdictional Requests for Production of Documents to be served electronically on counsel of record by electronic mail, pursuant to Paragraph 9(b) of Case Management Order No. 2 (June 16, 2004), with an additional copy sent by first class mail, postage prepaid to:

Robert Haefele, Esquire  
Motley Rice, P.A.  
28 Bridgeside Boulevard  
P.O. Box 1792  
Mount Pleasant, S.C. 29465

*Alan R. Kabat*

---

Alan R. Kabat